

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

POMERANTZ HAUDEK BLOCK  
GROSSMAN & GROSS LLP

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Tel.: (212) 935-7400

*Proposed Lead Counsel for Plaintiffs and the Class*

-----x  
CAROLYN GREENE, on behalf of herself :  
and all others similarly situated, :  
: Plaintiff, :  
: :  
-against- : Civil Action No.03-CV-12628-NG  
BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICHARDS, :  
: Defendants.  
-----x

[Additional captions on following page]

DECLARATION OF MARC I. GROSS  
IN SUPPORT OF MEMORANDUM OF LAW  
IN SUPPORT OF PLAINTIFFS MOTION FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND FOR APPROVAL OF LEAD COUNSEL

-----x  
JOIN G. ESPOSITO, on behalf of himself :  
and all others similarly situated, :  
: Plaintiff, :  
: -against- : Civil Action No.04-CV-10013-NG

BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICHARDS, :  
: Defendants. :

-----x  
JAMES J. NIZZO, VIRGINIA C. NIZZO, and :  
CARLO CILIBERTI, on behalf of themselves :  
and all others similarly situated, :  
: Plaintiff, :

-----x  
: -against- : Civil Action No.04-CV-10065-NG  
BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICIIARDS, :  
: Defendants. :

-----x  
BARRY BROOKS, on behalf of himself :  
and all others similarly situated, :  
: Plaintiff, :  
: -against- : Civil Action No.04-CV-10077-NG

: BIOPURE CORPORATION, :  
: THOMAS A. MOORE, CARL W. RAUSCH, :  
: and RONALD F. RICHARDS, :

: Defendants. :

-----x  
ANASTASIOS PERLEGIS, on behalf of himself :  
and all others similarly situated, :

: Plaintiff, :  
: -against- : Civil Action No.04-CV-10078-NG

: BIOPURE CORPORATION, :  
: THOMAS A. MOORE, CARL W. RAUSCH, :  
: and RONALD F. RICHARDS, :

: Defendants. :

-----x  
MARTIN WEBER, on behalf of himself :  
and all others similarly situated, :  
:  
:  
Plaintiff, :  
:  
-against- :  
:

Civil Action No.04-CV-10090-NG

BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICHARDS, :  
:  
:

Defendants. :  
-----x

-----x  
MODEL PARTNERS LIMITED, on behalf of :  
themselves and all others similarly situated, :  
:  
:

Plaintiff, :  
:  
-against- :  
:

Civil Action No.04-CV-10155-NG

BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICHARDS, :  
:  
:

Defendants. :  
-----x

-----X

GREGORY KRUSZKA, on behalf of himself	:	
and all others similarly situated,	:	
	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	Civil Action No.04-CV-10202-NG
BIOPURE CORPORATION,	:	
THOMAS A. MOORE, CARL W. RAUSCH,	:	
and RONALD F. RICHARDS,	:	
	:	
	:	
Defendants.	:	

-----X

DECLARATION OF MARC I. GROSS IN SUPPORT OF  
MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS MOTION  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF LEAD COUNSEL

I, Marc I. Gross, hereby declare that:

1. I am a member of Pomerantz Haudek Block Grossman & Gross LLP. I submit this Declaration in support of the motion for appointment of Selina and Alexander Chao as Lead Plaintiffs.
2. Submitted herewith are the following exhibits:

**EXHIBIT A:** Certificate detailing Selina and Alexander Chao's transactions in Biopure common stock.

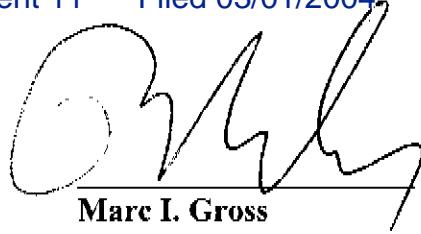
**EXHIBIT B:** Chart identifying Selina and Alexander Chao's transactions in Biopure's common stock during this period.

**EXHIBIT C:** Caulcy Geller Bowman & Rudman LLP's December 30, 2003 press release announcing a securities class action lawsuit has been filed against Biopure Corporation, et al.

**EXHIBIT D:** Firm Biography of Pomerantz Haudek Block Grossman & Gross LLP.

**EXHIBIT E:** Firm Biography of Wechsler Harwood LLP.

February 27, 2004



A handwritten signature in black ink, appearing to read "M. Gross". It is written in a cursive style with a horizontal line underneath it.

Marc I. Gross